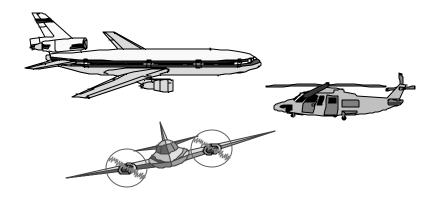
# UPDATE ON FIELD APPROVALS



## What is a Field Approval?

- An FAA approval in the field for non-complex mods
  - Issued by the FSDO for a **major alteration** to a TC'd product
  - Executed on a Form 337
  - Block 3 signed by the inspector FAA Approval of the data
  - For one aircraft (model type and serial number)
- If the data has been approved, then FAA Approval is not needed - No signature on Block 3

NOTE: Form 337 is also used to document a **major repair** 

- No alteration to the product No signature on Block 3
- · Perform to FAA Approved data

## DEMAND ON FIELD APPROVALS

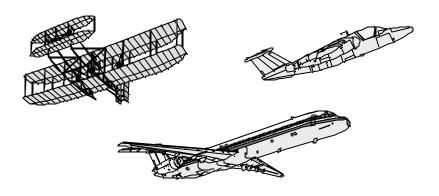
- Why?
  - To meet customer needs in a timely fashion
  - Reduces ACO admin. resources for a one-time STC
    - As a result, ACO redirects resources to other programs
  - FSDO has the authority but sometimes needs ACO/DER technical support
    - Implementation of LAACO/AWP-200 Working Agreement
    - Released on May 01, 1998
  - Partnership between ACO/FSDO/DER/Aviation Community

## FIELD APPROVAL Vs. One-time STC

- Both are a major alteration (change) to type design
  - Accomplished per FAA Approved data
  - Meets all of affected regulations
  - For a specific aircraft model and serial number
  - Data may not be sufficient for duplication
  - Have equal legal recognition

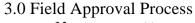
## LAACO & AWP-200 WORKING AGREEMENT

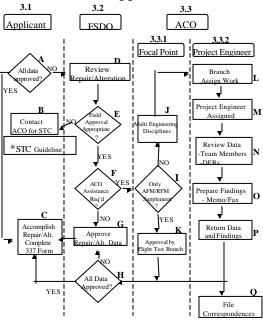
Guidance for Field Approvals of a Major Repair/Alteration



## FIELD APPROVAL WORKING AGREEMENT

- Key Players
  - Applicant
  - FSDO Aviation Safety Inspector (ASI)
  - Aircraft Evaluation Group (AEG)
  - ACO Focal Point (FP)
  - ACO Project Engineer (PE)
  - Designated Engineering Representatives (DERs)





## **DER's INVOLVEMENT**

- DO
  - Act as a LIASON between the applicant and FSDO/ACO
  - Develop and approve data within delegated functions (Major Repair/Alteration)
  - Make findings to applicable FARs
    - Perform compliance and installation reviews
    - Not a desk-top review
  - Mentor the inspectors regarding FAR compliance
    - If disagree on the approach, don't approve the data
    - Contact ACO Focal Points for further assessment

#### **DER's INVOLVEMENT**

#### DO

- Pertinent information on 8110-3
  - List specific regulations/areas that have been approved
  - List other areas/systems, <u>if known</u>, that need review/approval
- Data submittals
  - Original 8110-3 to appointed ACO
  - Copy of 8110-3 and data to FSDO and modifiers (aircraft owners, repair stations)

#### **DER's INVOLVEMENT**

#### • DON'T

- Approve the type of inspection and inspection intervals
- Grant field approval (don't sign Block 3 of Form 337)
- Conduct conformity inspection (don't sign Block 6)
- Return the aircraft back to service (don't sign Block 7)
- List inappropriate FAR's on 8110-3. For example:
  - 21.93 Acoustical Change
  - 21.95 Minor Change, 21.97 (Major Change)
  - 21.50 IFCA
  - 43.13, Appendix A
  - AC 43.13-1B or -2A

#### **DER's INVOLVEMENT**

#### • DON'T

- Approve repair station standard shop procedures and processes such as:
  - · Personnel qualifications and training
  - Equipment/component handling
  - Receiving/inspecting/cleaning/shipping
  - NDT inspection procedures
  - Repair station Operating Spec. or IPM (Inspection Procedure Manual)
- Approve generic process specs

#### **DEFINITION of DATA**

Information that defines the configuration, system(s), and/or its operation

- Process specifications
- Stress analysis, Electrical load analysis, etc.
- Drawings, sketches, or photos
- Engineering Orders (EOs)
- Service Bulletins (S/Bs)
- Design Limitations Operation or Maintenance

#### APPROVED DATA

- Original Equipment Manufacturer (OEM) data
  - Structural Repair Manual (SRM)
  - Service Bulletins, Mod drawings
  - Repair processes & procedures
- DER approved data (Form 8110-3)
- Form 337s
- TCDS
- STC's
- Airworthiness Directives (AD's)
  - AMOC (Alternative Method of Compliance to the AD)

#### PREVIOUSLY APPROVED DATA

- Can be used as a basis to obtain field approvals
  - If the data is applicable and eligible to the mod
- Consists of:
  - One-time STC approved data,
  - Previously approved data via 337s (after 1955), or
  - SRM, mod drawings, etc.
- The acceptance is at the inspector's discretion
  - May vary from one to another based on their experience, and comfort level

## USE of PREVIOUS STC APPROVED DATA

•	A written statement must be provided (from the STC								
	holder) if:								
	<ul> <li>Any person who wishes to use the STC data to make a modification</li> </ul>								
	<ul> <li>Example: may hereby use STC SAxxxxxx to modify (aircraft, aircraft engine, propeller, or appliance)</li> </ul>								
	Reference: FAA Notice 8110.69, dated 6/30/97 and Public Law 104-264, Section 403								
•	Flight Standards will impose the above requirement prior to granting field approvals if based on STC approved data								

#### ACCEPTABLE DATA

- Acceptable methods, techniques, and practices
  - AC 43.13-1B Aircraft Repair & Inspection
  - AC 43.13-2A Aircraft Alteration
- Previously approved 337's data (after 1955)
- ASTM, Mil-Spec, SAE, etc.
- Original Equipment Manufacturer (OEM) data
  - Service/Overhaul Manual
  - Illustrated Parts Catalog (IPC) & Maintenance Manual (M/M)
- U.S. Armed Services Tech Orders/Directives (TO/TD)

**NOTE:** Acceptable data can be used <u>as an approval basis</u> for obtaining FAA Approval

#### PROCESS SPECIFICATIONS

- From the ACO perspective, a process specification must contain the following information:
  - A procedure/process on how to perform a repair
  - A spec/standard that a repair is being performed too
- Some process specs require FAA approval
  - Not industry accepted practices/specs
  - Specific to a repair/component
  - Not contained in and/or deviation to the OEM procedures
- ACO generally does not approve generic process specs

#### SHOP PRACTICES/PROCESSES

- Specific to a repair station and may vary from one to another
  - Equipment or component receiving/handling
  - Inspecting/cleaning/shipping
  - NDT procedures or other type of inspections
- Do not contain technical engineering data/info that require ACO/DER approval
- May have been accepted by the FAA (AC 43.13-1B/-2A) or industry

### **COMPLIANCE INSPECTION**

- ACO/DER/FSDO performs the compliance inspection to ensure the installation meet the regulations. For example:
  - Propeller clearance, FAR 23.925
  - Misc. Markings and Placards, FAR 23.1557
  - Warning, Caution, Advisory Lights, FAR 23.1322.
- Certain compliance inspections are reserved for the FAA
  - Emergency evacuation and exits, FARs 23.803 & 23.807
  - Width of aisle, FAR 23.815
  - Fire zone and flammable fluid protection, FAR 23.863
  - Delegated on a case-by-case basis to DERs

### **CONFORMITY INSPECTION**

- A&P mechanic/IA/FSDO conducts the review to ensure
  - The part/equipment is installed IAW the drawing
  - The part/equipment is repaired IAW the repair data
  - The instrument/equipment is within the calibration date/data
  - The part/equipment has the correct part and serial numbers
  - The overall airworthiness of the aircraft

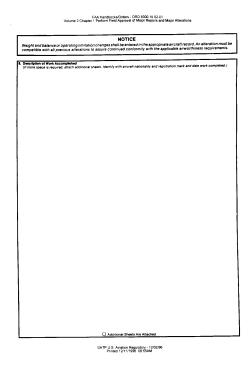
NOTE: IAW (In Accordance With)

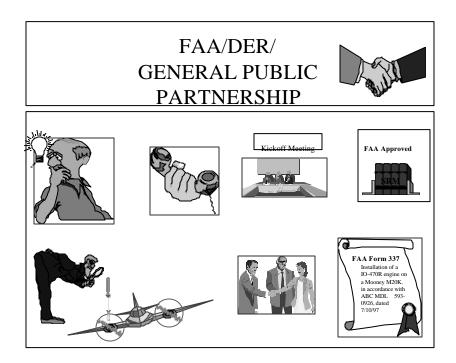
## FIELD APPROVAL PROJECT COMPLETION

- DER data package is complete, thorough, and applicable to the modification
  - Form 337 is filled out except for
    - Block 3 (FSDO Approval), Block 6 (A&P Mechanic for conformity inspection), and Block 7 (IA return to service)
  - Block 8 of Form 337 must reference:
    - The 8110-3 or other approved means (SB, AD, etc.)
    - · AFM/RFM Supplement, if required
    - · IFCA if different from OEM procedures
    - Installation instructions, wiring diagram, CMM, IPC, SRM, etc.
    - Any other documents that are used to accomplish the modification
      - AC 43.13-1B, Chapter xx, Page xx

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C. Vuong & S. Kolb --- ANM-140L Page 5 - 12